

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

ROBERT D. BELUE, et al.,

Plaintiffs,

vs.

A.O. SMITH ELECTRICAL PRODUCTS

COMPANY, a division of A.O. Smith

CORPORATION; et al.,

Defendant.

CIVIL ACTION NO.  
2:06-CV-1034-WKW

ALLIS-CHALMERS CORPORATION PRODUCT LIABILITY TRUST'S  
MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION TO SEVER AND FOR MORE  
DEFINITE STATEMENT

Defendant ALLIS-CHALMERS CORPORATION PRODUCTION LIABILITY TRUST (improperly identified in the Complaint as Allis-Chalmers Corporation) hereby joins in and adopts by reference the **Motion to Dismiss, or In the Alternative, Motion to Sever and for More Definite Statement and Supporting Memorandum of Law** filed by Sunbeam Products Incorporated (Doc. 258) on May 16, 2008. Sunbeam Products Incorporated's motion and supporting materials are hereby adopted and incorporated by reference as if fully set forth herein.

WHEREFORE, PREMISES CONSIDERED, Defendant Allis-Chalmers Corporation Product Liability Trust prays that Sunbeam Products Incorporated's Motion to Dismiss, or In the Alternative, Motion to Sever and for More Definite Statement and Supporting Memorandum of Law (Doc. 258) be granted.

/s/ Haley Andrews Cox

One of the Attorneys for Defendant

Allis-Chalmers Corporation Product Liability Trust

(improperly identified in the Complaint as Allis-Chalmers Corporation)

## OF COUNSEL:

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**CERTIFICATE OF SERVICE**

This is to certify that on this 3rd day of June, 2008, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Middle District of Alabama using the CM/ECF system, which will provide notice to all counsel of record.

I further certify that I mailed a copy of the foregoing, by United States Mail, to the following counsel of record:

G. Patterson Keahey, Jr., Esq.  
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/s/ Haley Andrews Cox  
OF COUNSEL